

**UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF WISCONSIN**

In re:

Palace Theater, LLC,

Debtor.

Case No. 21-11714

Chapter 11

NOTICE OF MOTION TO VOLUNTARILY DISMISS CHAPTER 11 CASE

PLEASE TAKE NOTICE that the Debtor, Palace Theater, LLC, by its attorneys, Steinhilber Swanson LLP, by Paul G. Swanson, has filed a Motion to Voluntarily Dismiss Chapter 11 Case (the "Motion"), a copy of which is attached hereto.

PLEASE TAKE FURTHER NOTICE that a hearing will be held before the Honorable Rachel M. Blise, United States Bankruptcy Judge, on a date to be set by the Court, but not before **August 19, 2022**, by agreement of the debtor and its secured creditor, Kramer Brothers, at the U.S. Bankruptcy Court, Western District of Wisconsin, 120 North Henry Street, Room 340, Madison, Wisconsin to consider the Debtor's Motion

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in the bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the Debtor's Motion, or if you want the Court to consider your views on the matter, then no later than **21 days from the date of this notice**, you or your attorney must:

1. File with the Court a written objection at:

Clerk of the U. S. Bankruptcy Court
120 North Henry Street, Room 340,
Madison, Wisconsin

If you mail your objection to the Court for filing, you must mail it early enough so the Court will receive it on or before the date stated above.

2. You must also mail a copy to:

Office of the U. S. Trustee
780 Regent Street, Suite 307
Madison, Wisconsin 53715

Paul G. Swanson
107 Church Avenue
Oshkosh, Wisconsin 54901

Any objection should state briefly the grounds for such objection and request a hearing date. Unless a written request for hearing is filed with the Court and copies mailed as instructed above, on or before the date indicated above, an order will be entered granting the relief requested in the Motion.

Dated this 7th day of July, 2022.

STEINHILBER SWANSON LLP

By: /s/
Paul G. Swanson
Attorney for the Debtor
107 Church Avenue
Oshkosh, WI 54901
Tel: (920) 235-6690; Fax: (920) 426-5530

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MOTION TO VOLUNTARILY DISMISS CHAPTER 11 CASE

NOW COMES the Debtor, Palace Theater, LLC, by its attorneys, Steinhilber Swanson LLP, by Attorney Paul G. Swanson, and, pursuant to 11 U.S.C. § 1112(b) hereby moves for an order dismissing the above-referenced chapter 11 case. In support thereof, the Debtor states as follows:

Jurisdiction and Background

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a) and 1334(a), and the order of reference in this district entered pursuant to §157(a). This is a core proceeding under 28 U.S.C. §157(b)(2)(a). Venue is proper in this District pursuant to 28 U.S.C. §§ 1408 and 1409.
2. The basis for the relief sought herein is 11 U.S.C. § 1112(b)
3. On August 16, 2021, Palace Theater, LLC (hereinafter, “Debtor”) filed its petition for relief in this Court. On March 31, 2022, the Court ordered the Debtor to “proceed as a regular chapter 11 debtor” (ECF No. 243).
4. The Debtor remains in possession of its property and is operating its business as debtor in possession, pursuant to §§1107 and 1108 of the Bankruptcy Code. No unsecured creditors committee, trustee or examiner has been appointed in this case.

Request for Relief

5. The Debtor filed this case in an effort to reorganize its business operations after the effects of the COVID pandemic which caused an extended closure of its business operations.

- Dated this 7th day of July, 2022.

By: /s/
Paul G. Swanson
Attorney for the Debtor
107 Church Avenue,
Oshkosh, WI 54901
Tel: (920) 235-6690; Fax: (920) 426-5530